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February 22, 2023

**VIA ECF**

Magistrate Judge Marcia M. Henry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:    Joint Request to Extend Discovery Deadline from May 5, 2023 to July 5, 2023.**

*Fadlevich v. JD 34<sup>th</sup> Street Realty, LLC, No. 1:19-cv-04227-DG-MMH*

Dear Judge Henry:

The undersigned represents the Plaintiff Mark Fadlevich in the above-captioned FDCPA action.

Due to conflicts in schedules and technical difficulties in producing certain documents such as emails in their native electronic format, there has been a delay in completing the paper discovery needed prior to beginning depositions of the parties, as well as scheduling difficulties in arranging the depositions themselves. Accordingly, the parties jointly request a 60 day extension of the current deadline of May 5, 2023 to July 5, 2023 to complete fact and expert discovery. This is the first request for an extension of the discovery schedule set at the hearing on January 5, 2023. The parties do not believe it is necessary to adjourn the deadline for a joint status report on April 6, 2023.

Respectfully,

/s/

Emma Caterine